

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,
MARY DOE and MARY ROE,
on behalf of themselves and
all others similarly situated,

File No. 2:22-cv-10209

Plaintiffs,
v. Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the
State of Michigan, and COL. JOSEPH
GASPER, Director of the Michigan State
Police, in their official capacities,

Mag. Curtis Ivy, Jr.

Defendants.

PLAINTIFFS' UPDATED EXHIBIT LIST

Pursuant to agreement of the parties, Plaintiffs amend their exhibit list. Plaintiffs, through their attorneys, may introduce the following exhibits at trial.

1. All documents previously produced by the Plaintiffs to the Defendants.
2. All documents being disclosed contemporaneously with this exhibit list, or that will be disclosed on an ongoing basis as those documents are obtained or created.
3. All expert reports previously disclosed to Defendants. This includes all expert witness reports filed on the record, and all expert witness reports disclosed to Defendants during discovery.
4. All documents with respect to the individual named plaintiffs. These documents have already been provided to Defendants.

5. All documents from *Does I*, including pleadings, the Joint Statement of Facts, exhibits to the Joint Statement of Facts, deposition transcripts, interrogatories, documents produced by Defendants, responses to requests for admission, and other discovery evidence. These documents have already been provided to or are in the possession of the Defendants.
6. All documents from *Does II*, including pleadings, declarations, notices, and documents produced by the Defendants. These documents have already been provided to or are in the possession of Defendants.
7. All documents already filed in *Does III*, including any exhibits attached to any pleading or motion. These documents are in Defendants' possession.
8. Responses to formal and informal discovery requests and documents produced in response to formal and informal discovery requests in this case, including all documents and responses produced by Defendants.
9. All documents produced by the Michigan Department of Corrections. The MDOC has been providing these documents and data to Defendants when producing them to Plaintiffs.
10. All documents produced in response to any subpoena issued by Defendants.
11. Transcripts from any depositions taken in this case, or in *Does I*, and any documents used as an exhibit or discussed during such depositions.
12. All relevant policies and procedures of the Michigan State Police, including those related to the Sex Offender Registry.
13. All relevant information available on Michigan's Public Sex Offender Registry, including screenshots of publicly available registry pages.
14. All articles, books or other documents cited by any party or any party's witnesses, and all published scholarship necessary to rebut or impeach Defendants' witnesses.

15. All information available on the public website of the Society for the Advancement of Actuarial Risk/Need Assessment (SAARNA), <https://saarna.org/>.
16. Any publicly available documents related to the subject matter of the lawsuit.
17. All documents identified by Defendants.
18. All documents needed to lay a foundation.
19. All documents needed for rebuttal or impeachment.
20. All documents or electronically stored information that may be ascertained through continuing discovery or investigation.

Plaintiffs reserve the right to amend and supplement this list, up to and including the day of trial.

This exhibit list is intended to supplement Plaintiffs' initial disclosures under Rule 26.

Respectfully submitted,

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Dated: June 16, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2023, I served the above document(s) on counsel of record via email.

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